

General Records Schedule Policy

Upon Public Records Board (PRB) approval of a General Records Schedule (GRS), the implementation of said schedules by Wisconsin state agencies is mandatory and immediate. Implementation of a PRB-commissioned GRS by the UW System Administration, all UW campuses, all Wisconsin counties, municipalities or other local units of government is optional but recommended. This policy is in accordance with the authority outlined under Wis. Stats. § 16.61.

Policy Statement

General Record Schedules are a mechanism for systematic retention and disposition of similar types of records across all government units. GRSs eliminate the need for state agencies to develop and seek approval of their own records retention disposition authorizations (RDAs). They lend consistency to recordkeeping across all government units and provide assurance of accountability to the public. The PRB supports the development of, and has approved, GRSs in several functional areas. This policy statement mandates usage and implementation of these schedules, as well as outlines a process and requirements that state agencies must use to opt out of any or all of them, in whole or in part. See page 3 for implementation guidance and frequently asked questions. For additional information on use of the GRS see the Introduction to General Records Schedules.

All state agencies are bound by this policy. State agencies may choose to opt out of a GRS, in whole or in part; however, to opt out in whole or in part, an agency must develop corresponding RDAs of their own within 12 months from the date of the GRS approval, citing justification for the unique requirement. During that time, and until their replacement, the agency will be bound by retention schedules which have been approved by the PRB in the General Records Schedule.

UW System Administration, all UW campuses, all Wisconsin counties, municipalities or other local units of government may:

Opt In: The UW System Administration, all UW campuses, all Wisconsin counties, municipalities or other local units of government may opt in, using the Notification of General Schedule Adoption form (PRB-002), and agree to use the recommendations noted in the GRS for its records. **(State agencies do not have this option because any GRS is mandatory and immediate on approval).**

Opt In with Revisions: The UW System Administration, all UW campuses, all Wisconsin counties, municipalities or other local units of government may opt in with revisions using the Notification of General Schedule Adoption form (PRB-002). They agree to use some of the recommendations of the GRS and also submit a list of records series they will be opting in to or out of. They must develop and submit to the PRB corresponding records series of their own within 12 months from the date of GRS approval for any record series they opt out of. It is recognized that local units may in some areas have the need to retain items for a longer period of time than that recommended by the GRS. This is an internal business decision and can be done without any action. **(State agencies do not have this option because any GRS is mandatory and immediate on approval).**

State agencies, UW System Administration, all UW campuses, all Wisconsin counties, municipalities or other local units of government may:

Opt Out: State agencies may opt out of a GRS in whole or in part, using the Notification of General Schedule Adoption form (PRB-002). The agency must develop, and submit to the PRB, within 12 months, RDA(s) for

the records covered by the GRS which they chose to opt out of citing justification for the unique requirement. Until they receive PRB approval for those RDAs, they will be bound by the GRS.

State agencies should be aware that current law (Wis. Stat. § 16.61) requires authorization of the PRB to destroy any state agency records. Therefore, if a state agency chooses to opt out of any existing GRS, they may not dispose of any records until the RDAs prepared by the state agency have been approved by the Public Records Board and the retention period reached.

Wisconsin counties, municipalities and other local units of government should be aware of how current law (Wis. Stat. § 19.21(4)(b) & (5)(c) respectively) addresses record retention and disposition, as well as PRB authorization.

Implementing General Records Schedules

Upon PRB approval, agencies will use an identified GRS for any applicable records in its custody. This means that following approval, records should continue to be disposed on a regular basis, provided that the minimum retention time identified in the GRS has been met. Records must be retained for the minimum retention time approved in the GRS and cannot be disposed of in a shorter amount of time. If a GRS identifies a record series with a disposition of transfer to an archival repository, those records must be offered to the archival repository rather than being destroyed. Destruction or transfer of records is contingent on record disposition restrictions contained in Wis. Stat. § 19.35 (5) (Open Records Law). No records may be destroyed or transferred if litigation or audit involving the records has commenced.

State agencies may discontinue the use of all, or portions of, any GRS, but the agency records officer must first notify the PRB of the discontinuance, by following the steps noted in the policy above. When an agency discontinues use of a GRS, the records controlled by the applicable record series may no longer be destroyed or transferred until separate RDAs are prepared by the agency and approved by the PRB. Until that time, the agency must continue to abide by the retention and disposition in the existing GRS.

General Records Schedule (GRS) -- Frequently Asked Questions

1. *What happens to pre-existing General Records Schedules when an amended or renewed GRS is approved?*

The pre-existing GRS is superseded by the new GRS immediately upon approval.

2. *What happens when a General Records Schedule (GRS) automatically goes into effect?*

Upon Public Records Board (PRB) approval of a General Records Schedule (GRS), the implementation of said schedules by Wisconsin state agencies is mandatory and immediate.

3. *What happens to any pre-existing agency Records Disposition Authorizations (RDAs) on topics covered by a General Records Schedule (GRS)?*

- a. Pre-existing agency RDAs with a longer retention period stand until their sunset date is reached.
 - i. The agency Records Officer should submit the appropriate form to formally supersede the pre-existing RDA before the sunset date is reached.
- b. Pre-existing agency RDAs with a shorter retention period must be acted on within 12 months of the GRS approval date. Until that time, the agency must abide by the GRS. Appropriate action includes: superseding or amending.
 - i. The agency Records Officer should submit the appropriate form to supersede or amend the pre-existing RDA.
- c. Any pre-existing RDAs with a shorter retention period which the agency does not act on within 12 months, will become obsolete and
 - i. The longer GRS mandated retention time must be followed and

- ii. The agency Records Officer must submit the appropriate form to formally close the pre-existing RDA.

4. Why would an agency business unit choose to submit their own RDA for records covered by a GRS RDA?

- a. Unique retention requirements for a set of specific business unit records. Requested retention period cannot be shorter than the approved GRS retention.
- b. Unique disposition requirements for a set of specific business unit records which is different than the approved GRS.

Note: A state agency cannot dispose of records covered by the GRS until the business unit RDA is approved by the PRB.

5. What happens when the entire agency opts out of a GRS in whole or in part?

State agencies may opt out of a GRS in whole or in part, using the Notification of General Schedule Adoption form (PRB-002). The agency must develop and submit to the PRB, within 12-months, RDA(s) for the records covered by the GRS which they chose to opt out of citing justification for the unique requirement. Until they receive PRB approval for those RDAs, they will be bound by the GRS. Appropriate justification includes: statute, code, or other legal authority.